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***Attorney for Defendant***

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, | 2:16-cr-00265-GMN-CWH

*Plaintiff,* | **STIPULATION AND ORDER**  
v. | **TO CONTINUE DEADLINE FILE**  
JEREMY JOHN HALGAT, | **OBJECTIONS TO DOC. 1416**

*Defendant.*

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Dayle Elieson, United States Attorney, and Christopher Burton, Assistant United States Attorney, and JEREMY JOHN HALGAT, by and through his attorney, Richard E. Tanasi, Esq., that the **deadline to file Defendant Halgat's Objections to Doc. 1416** in the above-captioned matter, now scheduled for ***January 9, 2019***, be vacated and continued to ***January 23, 2019***.

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1           This Stipulation is entered into for the following reasons:

2           1.       On December 26, 2018, this Honorable Court issued a Report and  
3 Recommendation denying Defendant Jeremy John Halgat's Motion to Dismiss (ECF No. 864).  
4 [ECF No. 1416]. Also, on December 26, 2018, this Honorable Court Ordered Defendant  
5 Jeremy John Halgat to re-file a more specific Motion to Compel (ECF No. 858), no later than  
6 January 11, 2019, after he narrows the discovery issues and meets and confers with the  
7 government. (ECF No. 1417). Defense counsel needs additional time to review the currently  
8 large volume of discovery, and then meet and confer with the Government to determine whether  
9 the issues raised in Jeremy John Halgat's Motion to Compel (ECF No. 858) are still ripe.  
10 Additionally, Defense counsel needs additional time to prepare Objections to this Honorable  
11 Court's Report and Recommendation denying Defendant Jeremy John Halgat's Motion to  
12 Dismiss (ECF No. 864). [ECF No. 1416].

13           2.       This is the first stipulation to continue this deadline in this matter.  
14           3.       The additional time requested herein is not sought for purposes of delay.  
15           4.       Additionally, denial of this request for continuance could result in a miscarriage  
16 of justice.

17           WHEREFORE, the parties respectfully request that this Honorable Court accept the  
18 Stipulation and enter an Order as set forth below, continuing the deadline to file Defendant  
19 Halgat's Objections to Doc. 1416 in the above-captioned matter, now scheduled for **January**  
20 **9, 2019, to January 23, 2019.**

21           DATED this 3<sup>rd</sup> day of January, 2019.

22           DAYLE ELIESON 23           United States Attorney 24           _____ 25           CHISTOPHER BURTON 26           Assistant United States Attorney 27           501 Las Vegas Blvd., South 28           Suite 1100 Las Vegas, NV 89101 Attorney for the UNITED STATES	22           TANASI LAW OFFICES 23           _____ 24           RICHARD E. TANASI, ESQ. 25           601 S. Seventh Street, 2 <sup>nd</sup> Floor 26           Las Vegas, NV 89101 Attorney for Defendant
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  <i>Plaintiff</i>	2:16-cr-00265-GMN-CWH
v.  JEREMY JOHN HALGAT,  <i>Defendant.</i>	<b>ORDER ON STIPULATION</b>

This matter coming before the Court on Stipulation, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

1. On December 26, 2018, this Honorable Court issued a Report and Recommendation denying Defendant Jeremy John Halgat's Motion to Dismiss (ECF No. 864). [ECF No. 1416]. Also on December 26, 2018, this Honorable Court Ordered Defendant Jeremy John Halgat to re-file a more specific Motion to Compel (ECF No. 858), no later than January 11, 2019, after he narrows the discovery issues and meets and confers with the government. (ECF No. 1417). Defense counsel needs additional time to review the currently large volume of discovery, and then meet and confer with the Government to determine whether the issues raised in Jeremy John Halgat's Motion to Compel (ECF No. 858) are still ripe. Additionally, Defense counsel needs additional time to prepare Objections to this Honorable Court's Report and Recommendation denying Defendant Jeremy John Halgat's Motion to Dismiss (ECF No. 864). [ECF No. 1416].

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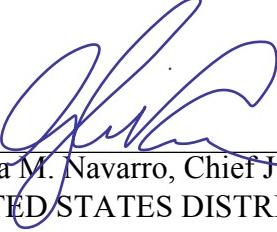
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- 1           2. This is the first stipulation to continue this deadline in this matter.  
2           3. The additional time requested herein is not sought for purposes of delay.  
3           4. Additionally, denial of this request for continuance could result in a miscarriage  
4 of justice.

5           **WHEREFORE, IT IS HEREBY ORDERED, that the deadline to file Defendant**  
6 **Halgat's Objections to Doc. 1416** in the above-captioned matter, now scheduled for  
7 **January 9, 2019**, be vacated and continued to **January 23, 2019**.

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9           **DATED** this 8 day of January, 2019.

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12           Gloria M. Navarro, Chief Judge  
13           UNITED STATES DISTRICT COURT

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 3rd day of January, 2019 , the undersigned served the foregoing **STIPULATION AND ORDER** on all counsel of record herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/  
An employee of TANASI LAW OFFICES